Craig P. Tanio, M.D.



Ben Steffen EXECUTIVE DIRECTOR

MARYLAND HEALTH CARE COMMISSION

4160 PATTERSON AVENUE – BALTIMORE, MARYLAND 21215 TELEPHONE: 410-764-3460 FAX: 410-358-1236

October 22, 2015

By E-Mail and U.S. Mail

John F. Morkan III, Esquire Ober, Kaler, Grimes & Shriver 120 East Baltimore Street Baltimore, Maryland 21202

Re: October 21, 2015 Revised Revenue and Expense Projections

Adventist HealthCare, Inc.

Application for Certificate of Need

Docket Number 13-15-2349

Dear Mr Morkan:

Thank you for your response to my request for revised and updated financial projections revised to reflect HSCRC's action on Washington Adventist Hospital's partial rate application. I have several questions regarding the materials I have received.

- 1. What is included in the projections (current dollars and inflated) labeled *Option 4 The Project*? Does it include both the proposed relocated hospital and special hospital psychiatric, or just the relocated hospital?
- 2. Do the projections labeled Option 4 Takoma Park (current and inflated) include just the proposed special hospital? If other services, which ones?
- 3. I have taken note of the recent loss by Maryland's Medicaid program of the waiver from the Institutions for Mental Diseases (IMD) exclusion, which has had a significant impact on Medicaid reimbursement of freestanding psychiatric hospitals larger than 16 beds, such as that proposed for Takoma Park.
- a. Do the projections submitted reflect this new reimbursement status? If not, please provide alternative projections that reflect this current reality.
- b. Please provide the assumed payor mix for the special hospital-psychiatric and the actual per diem reimbursement rates by payor assumed for this facility. Provide these

Jack Morkan, Esq.

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assumptions for both projected revenue and expense schedules (i.e., the one assuming Medicaid fee-for-service reimbursement at levels prior to loss of the IMD exclusion waiver and the schedule assuming Medicaid reimbursement at the levels available after the loss of the IMD exclusion waiver.

c. Please comment on the continued viability of the proposed special hospital-psychiatric and the overall project given this change in payment for Medicaid patients at IMDs.

In order to avoid further delay in review of this project, I am again requesting expeditious turnaround of a response to this request for additional information. I would like to receive it no later than close of business on Monday, October 26, 2015. I will provide additional time for interested party comments on this additional information when I have received it.

Sincerely,

Frances B. Phillips

Commissioner/Reviewer

cc: Ulder Tillman, M.D., Montgomery County Health Officer

Paul E. Parker

Kevin McDonald

Joel Riklin

Suellen Wideman, AAG

Howard L. Sollins, Esquire

John J. Eller, Esquire

Kurt J. Fischer, Esquire

Marta D. Harting, Esquire

Thomas C. Dame, Esquire

Ella R. Aiken, Esquire

Susan C. Silber, Esquire

Kenneth Sigman, Esquire

Catherine S. Tunis, SOSCA President